

City of Yuba City



Public Works Department - Utilities Division

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SUBJECT: Comments on Tentative Order of the proposed National Pollution Discharge Elimination System (NPDES) Permit No. CA0079260 – Waste Discharge Requirements for the City of Yuba City Wastewater Treatment Facility, Sutter County.

The City of Yuba City appreciates the opportunity to review the Wastewater Treatment Facility Tentative Order. We appreciate the effort you have taken in reviewing the submitted Report of Waste Discharge and assistance during permit development. The following comments are provided regarding corrections, clarifications and suggested revisions in the Tentative Order.

1. Order R5-2019-XXXX Permit Table 2: To be consistent with recently issued permits the Latitude and Longitude level of accuracy should be limited to the second.
 - a. The center of the diffuser (Discharge Point 001) is located at Latitude 39° 05' 29" N and Longitude 121° 35' 53" W.
 - b. The center of the Disposal Ponds (Discharge Point 002) is Latitude 39° 04' 53" N and Longitude 121° 35' 56" W.
2. Order R5-2019-XXXX Permit IIIA - Discharge Prohibitions. The City of Yuba City (City) has previously submitted a letter of anticipated non-compliance with this Prohibition.
3. Attachment B - Map: Discharge Point 003 is indicated. Discharge Point 003 is no longer applicable and should be removed or footnote added.

4. Attachment C - Plant Flow Diagram: Discharge Point 003 is indicated. Discharge Point 003 is no longer applicable and should be removed or footnote added.
5. Table E-1
 - a. Monitoring Station Locations EFF-001 and EFF-002. To be consistent with recently issued permits the Latitude and Longitude level of accuracy should be limited to the second.
 - i. The center of the diffuser (Discharge Point 001) is located at Latitude 39° 05' 29" N and Longitude 121° 35' 53" W.
 - ii. The center of the Disposal Ponds (Discharge Point 002) is Latitude 39° 04' 53" N and Longitude 121° 35' 56" W.
 - b. Monitoring Location BIO-001 – Residual Sludge and Biosolids are defined in Order R5-2019-XXXX Section VI.C.5.b Sludge/Biosolids Treatment or Discharge Specifications. Presently the City does not fully verify, test and confirm that the thickened sludge is in full compliance with 40 C.F.R. part 503 for beneficial use. Thickened sludge is fully tested to ensure compliance with disposal as landfill Alternative Daily Cover.
 - i. The City recommends that the Monitoring Location Description be modified as follows: “A location where a representative sample of the *Residual Sludge or* Biosolids can be obtained.”
6. Table E-3 -
 - a. Average Depth of Water Over Diffuser:
 - i. Calculated value: The City is unclear as to the value that would be reported on the SMR and entered into CIWQS. Is the intent that a specific value would be entered or that the calculated value exceeds 0.8 feet. It is not known if there will be adequate Feather River flow variability to generate a curve of submergence values correlated to Feather River flows. It is anticipated that Feather River flow that results in 0.8 feet submergence will be determined.
 - ii. The City is unclear about the intent of the measurement. The calculation method allows a correlation between CDEC data and submergence. It is currently estimated that the diffuser obtains adequate submergence at approximately 10,000 cfs Feather River flow. Flows at this location have exceeded 300,000 cfs resulting in submergence of over 30 feet. At some point it is not possible to measure submergence.
 - iii. It is recommended that upon submergence of greater than eighteen inches that submergence be reported as greater than eighteen inches value.
 - b. Nitrate and Nitrite Footnote 14 should be referenced to Footnote 13
 - c. The City requests that temperature monitoring of 3 times per week be reduced to 2 times per week to match ammonia monitoring.

7. Tables E-2, E-3, E-5, E-6, E-7 and E-9: Electrical Conductivity test methods are not consistent between Tables E-2, E-3, E-7 and Tables E-5, E-6 and E-9. All Tables should include a footnote to allow use of field meter for Electrical Conductivity.
8. Attachment E Section V - Whole Effluent Toxicity Testing
 - a. Section V.A.2 - Acute Sample Type. Sample type includes a utilization of static non-renewal testing. This type of testing is not a permissible test design. The City suggests that the language be modified as follows: "...The Discharger may use flow-through, ~~static non-renewal~~, or static renewal testing. For ~~static non-renewal and~~ static renewal testing, the samples shall be flow"
 - b. Section V.A.2 - Acute Sample Type. Acute testing sample is required to be Monitoring Location EFF-001 while Chronic Sample Type allows a slight modification to that sample location. During periods of Chronic testing acute testing is not required due to chronic testing provides both acute and chronic information concurrently. Clarification of Sample Type during concurrent testing is requested. It is suggested that the Acute Sample Type be modified as follow: *"...taken at Monitoring Location EFF-001, or same sample location as Chronic Sample Type during concurrent analysis, when discharging at Discharge Point 001."*
 - c. Section V.A.5 and V.B.8 - Acute and Chronic Test Failure - To clarify notification the City requests the following language modification: "...days following notification *via receipt of final Test Report* of test failure."
 - d. Section V.B.5 -Chronic Toxicity testing Method. Fact Sheet Attachment Section IV.C.5.b.i identifies that the *"EPA test method is designed to measure toxic effects from chemical toxicants. The Chronic Toxicity Testing Method Manual allows for modification of effluent to control pathogen interference. The Discharger sampled for chronic toxicity in the chlorinated effluent in August 2018, which was the first chronic toxicity testing since the permit amendment. The August 2018 results demonstrated toxicity to C. dubia reproduction on chlorinated effluent that was dechlorinated in the laboratory; however, effluent samples that were freeze-treated to evaluate the use of freezing to remove microbial interferences resulted in 3 TUc."* The City requests that Attachment E Section V.B.5 -Chronic Toxicity Testing Method language be added as follows: *"Test Method may be modified to reduce suspected pathogen interference. Modifications may include freeze treating or other future identified modification method to reduce or remove suspected pathogen interference."*
 - e. Section V.C WET Testing Notification Requirements. To clarify notification the City requests the following language modification: "The Discharger shall notify the Central Valley Water Board within 24-hours after the receipt of *final Test Report* ~~test results~~ exceeding the monitoring trigger during regular or..."

- f. Section V.D.1 Chronic WET Reporting last paragraph. Typographical error. Reference to "monthly SMR" should be to "*Quarterly SMR*" to be consistent with Monitoring Frequency.
9. Attachment E Section IX.A.1.a - Biosolids Monitoring Location BIO-001. Due to the long biosolids detention time within the anaerobic digesters, and to be consistent with the Annual Pretreatment Reporting Requirements Section X.D.2, the City requests that the sampling frequency be modified to annually. Language change as follows: "A ~~composite~~ *grab* sample of sludge shall be collected ~~quarterly~~ *annually* at Monitoring Location BIO-001 in accordance with EPA's POTW Sludge Sampling and Analysis Guidance Document, August 1989, and tested for priority pollutants (excluding asbestos)."
10. Table E-8 The following Parameters are indicated as 24-hr Composite Sample Type and should be indicated as Grab Sample Type:
 - a. Chromium (VI),
 - b. Foaming Agents (MBAS),
 - c. Nitrate (as N)
 - d. Nitrite (as N)
 - e. Sulfide (as S)
 - f. Sulfite (as SO₃)
11. Attachment E Section X.D.2.a - Annual Pretreatment Reporting Requirements.
 - a. Table E-1 states that BIO-001 is a location where a representative sample of the biosolids can be obtained. The City collects BIO-001 after sludge dewatering. The source of solids entering the dewatering system, as shown in Attachment C, is the anaerobic digester system. Solids within the anaerobic digesters have long detention times measured in weeks. The City suggests modifying the language as follows: "The sludge analyzed shall be a *grab sample*. ~~composite sample of a minimum of 12 discrete samples taken at equal time intervals over the 24 hour period.~~"
12. Table E-9 - Footnote 6 should be applicable for all Parameters. The Footnote is not presently referenced on the Table.
13. Attachment E Section X.B.6.c - Reporting Protocols.
 - a. The City is unclear about the information that is being requested. The term "laboratory analysis sheets" is not an industry standard term and is open to wide interpretation by the City, CVRWQCB, and public. If the "laboratory analysis sheets" are interpreted to be "Final Laboratory Reports" the requested information will be quite voluminous. The Yuba City Laboratory numbering system creates a unique number for each sample collected at each location and each sample type. Each lab number generates an individual Final Lab Report and associated QA/QC information. The City evaluated a recent monthly SMR and determined that the Final Laboratory Reports generated for City performed analysis would be over

200 pages. These reports can be generated in a single PDF attachment and submitted via CIWQS. Location of specific information within the attachment will not be straightforward.

- b. Final Laboratory Reports do not include Bench Sheets. Bench Sheets are typically hand written notes, calculations, tare and final weights, BOD Dissolved oxygen values (initial and final), BOD sample volumes, progressive coliform tube status and other similar test progress information. These test progress data are then used to generate a final value that is entered into the Laboratory Information System for inclusion in the Final Laboratory Report.
 - c. In order to be most efficient, laboratories run many analyses in batches that include several samples from different sample locations and different customers. The Bench Sheets are typically not individualized for each customer, sample type, or location. If Bench Sheets are to be submitted it will require hand copying, redacting, recopying and creation of PDF files for submission. Bench Sheet analysis progress data are not entered into the City Laboratory Information System, but are logged and stored on hard copy data sheets.
 - d. The 200 plus page submission does not include contracted Final Laboratory Reports with QA/QC and may not include Bench Sheets the contracted laboratory may generate.
 - e. The majority of the over 200 pages of the information is related to analysis such as BOD, TSS, Coliform, EC, pH and similar parameters.
 - f. It is also unclear if the "laboratory analysis sheets" could be interpreted to include instrumentation calibration - both in the laboratory and in the process area.
 - g. The City laboratory is ELAP certified, participates in the Proficiency Testing Program and is audited by SWRCB Accreditation Program. Audits can be announced or unannounced. The City maintains a Quality Assurance Manual, Standard Operating Procedures, Calibration logs, Certificates of Analysis, Method Detection Limit studies, and Proficiency Testing data. All of the information is available upon request of the CVRWQCB.
 - h. The City requests that prior to inclusion of this new permit reporting requirement that further industry clarification and discharger consistency be evaluated and elucidated.
14. Attachment F IV.A.6 - Discharge Prohibitions. The City has previously submitted a letter of anticipated non-compliance with this Prohibition.
15. Attachment F IVC.3.c.viii.(c).(1) and (2) - pH. Effluent limitations are described as instantaneous minimums and maximums. pH sample type is a daily grab. To clarify that continuous monitoring is not required the City requests that the following language be added to both sections: "...instantaneous minimum and maximum *as determined per Effluent Monitoring Table E-3* are included in this Order...."

16. Table F-15 – Effluent pH samples are grab samples. To clarify that continuous monitoring is not required the City requests that an additional Footnote be added associated with the pH instantaneous minimum and maximum values of 6.5 and 8.5 respectively. Footnote language would be: "*As determined per Effluent Monitoring Table E-3*". Footnote 1 would be modified as follows: "...effluent limitation *as determined per Effluent Monitoring Table E-3* is limited to..."

17. Table F-17

- a. pH - The City requests that an additional Footnote be added associated with the pH instantaneous minimum and maximum values of 6.5 and 8.5 respectively. Footnote language would be: "*As determined per Effluent Monitoring Table E-3*".
- b. Typographical error - Mercury Basis should be "BP"
- c. Footnote 9 is not applied to any Parameters within the table. This footnote does not appear to apply to any Parameters or Effluent Limitations indicated in the Table and should be removed.

The City of Yuba City appreciates your consideration of comments submitted.

If you have any questions, or if further discussion would be of assistance regarding these comments, please contact me at (530) 822-7696

Respectfully Submitted,



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Wastewater Treatment Facility Supervisor